

Application No. 10/729,275  
Amendment dated September 13, 2005  
Reply to Office action of June 13, 2005

### **REMARKS**

Claims 1-2 and 4-16 are rejected under 35 U.S.C. § 102(e) as being anticipated by LINZER et al., US Patent Application Publication, Pub. No. US 2004/0100577.

Claims 3, 6, and 14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over LINZER et al. in view of BALKRISHNAN et al., US 6,028,612.

#### **I. Claim 1**

The Examiner characterizes LINZER et al. in a manner to meet the limitations of claim 1. Applicant will traverse the 35 U.S.C. § 102(e) rejections by addressing each of the Examiner's characterizations.

**A. "the memory controller means is analogous to the machine-readable memory, see fig 4 and 5, element 101 and section 0023"**

To be analogous, elements must perform the same function. It is clear from fig 4 of LINZER that the "memory controller" (element 101) and the "memory" (element 102) are distinct elements and are not performing the same function. Therefore, the Applicant contends that the memory controller means in LINZER et al is **NOT analogous** to the machine-readable memory as claimed.

**B. "decomposing pixel image data into multiple colorspace components (section 0043); and storing the multiple colorspace components in one continuous machine-readable memory segment in a machine readable memory"**

In LINZER et al. section 0042, "Luminance and chrominance values correspond to a decomposed representation of the three primary colors associated with each pixel element (or

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pixel)." In LINZER et al., the multiple colorspace components (e.g. luminance and chrominance) are NOT located in one continuous machine-readable memory segment.

Specifically, for example, in LINZER et al. section 00008, the storage structure does "not need two separate SDRAM controllers to independently control left and right halves of SDRAM I/O." From LINZER et al. section 0027, "when Bank i is addressed in the [left] memory 142, Bank i in the [right] memory 144 is also addressed." In LINZER et al. section 0029, "luminance and chrominance generally use different banks." Therefore, luminance and chrominance are not stored in a continuous machine-readable memory segment. Additionally, the individual luminance and chrominance values for a pixel will generally occupy more than one continuous machine-readable memory segment, since writing to Bank i, simultaneously accesses a left memory segment and a right memory segment.

Luminance and chrominance values may be the multiple colorspace components of the decomposition of a pixel, and although chrominance values may be stored adjacent to each other, LINZER et al teaches the separation of the luminance and chrominance values for meeting objectives of the invention. Therefore, it cannot be said that the multiple colorspace components, in LINZER et al, are stored in one continuous machine-readable memory segment."

In view of at least the arguments above with respect to the Examiner's characterizations A and B, it is respectfully submitted that claim 1 is in condition for allowance.

## II. Claim 9

The Examiner uses the same arguments for claim 1 and claim 9. The Examiner characterizes LINZER et al. in a manner to meet the limitations as claimed. Applicant will traverse the 35 U.S.C. § 102(e) rejections by addressing each of the characterizations.

### A. "Claim 9 is substantially similar to claim 1."

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Claim 1 is a "method for storing" and claim 9 is a "method for retrieving." The Examiner has not addressed the rejection to claim 9. Specially, the Examiner has not shown the element of "retrieving pixel image data."

**B. "the memory controller means is analogous to the machine-readable memory, see fig 4 and 5, element 101 and section 0023"**

To be analogous, elements must perform the same function. It is clear from fig 4 of LINZER et al. that the "memory controller" (element 101) and the "memory" (element 102) are distinct elements and are not performing the same function. Therefore, the Applicant contends that the memory controller means in LINZER et al. is NOT analogous to the machine-readable memory as claimed.

In view of at least the arguments above with respect to the Examiner's characterizations A and B, it is respectfully submitted that claim 9 is in condition for allowance.

### III. CONCLUSION

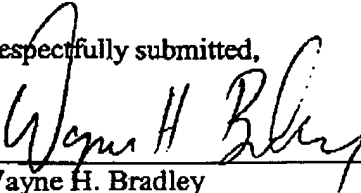
Claims 2-8 are dependent on claim 1, and claims 10-16 are dependent on claim 9. In view of at least the foregoing, it is respectfully submitted that the pending claims 1-16 are in condition for allowance. A Notice of Allowability is courteously solicited.

Should the Examiner disagree or have any questions regarding this submission, the Applicant respectfully requests that the Examiner telephone the undersigned at (312) 775-8000.

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The Commissioner is hereby authorized to charge additional fee(s) or credit  
overpayment(s) to the deposit account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,



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